All entities which sought construction permits for LPFM service and who were halted in their efforts by either:
1) third-adjacent rule(s) in place during the initial filing for a CP or
2) informal petitions to deny by self-proclaimed watchdog groups operating in clandestine fashion either on behalf of mega-broadcast groups, or out of misguided ego--
and whose application for a construction permit for LPFM service was accepted for filing, should have an opportunity to immediately re-enter the process and revive their LPFM application to provide local service via the LPFM rules which are currently in place.

For example, a California "watchdog" group which so pompously procliamed itself a champion of LPFM service, filed an informal comment. Phone conversation with this California group's leader-attorney revealed that the main reason for filing an objection was that myself as one entity member on behalf of our application and another applicant for a seperate LPFM frequency in a neighboring county were long-time friends. This California "watchdog" attorney was concerned as he put it: "as one who has fought for and is largely responsible for LPFM coming to existence, I am concerned that you and your friend are in collusion"

Collusion?!!! These are 100-watt FM stations with proposed transmitter sites some 23 miles apart!
Maybe the real issue was that the frequency for which we filed is at 105.5, sandwiched between Clear Channel owned 105.3 licensed to Bowdon, Ga. and 105.7, licensed to Canton, Ga.---both rim-shot signals to the Atlanta Metro-- the nation's 11th-largest market, where one rating point is about $9 million. And our county is a metro county.

Or maybe the local ownership of the all satellite-programmed station hired this "watchdog" attorney to protect its interest, knowing it has not served the public interest and honored its commitment to local programming.

Why would a California attorney go to such extreme over a low-power FM station. Had he really investigated he would have found that the two parties were local, one had held a high-level elected position in county covernment, while the other had considerable local media experience in the city of license. But that mattered NOT to the "watchdog" group that claims to champion LPFM

and "local" broadcasting.

What a sordid mess this entire LPFM has become. You would think that with constantly sliding revenue shares of the major radio groups, a few low-power FM stations here and there wouldn't be of concern to NAB Officials. Mega-group owners take ad dollars to promote XM and Sirrius, yet worry about low-power FM stations.

This entire LPFM spectrum has been a political football from the outset; however, credit Sen. McCain for his vision.

National Public Radio should stay out of the matter due to the fact that they receive federal funding. Their lone voice can only be the FCC.

To those of us who truly wish to provide our local areas with LOCAL programming of substance and issue-oriented programming of LOCAL interest, we admonish the FCC and Congress to re-visit some older Part 73 rules regarding local programming. Those rules no longer apply to the mega-broadcasters. A station licensed to the City of Nowhere, USA can have Nowhere mentioned a minimum of 168 times a week. That's once an hour and that is all that's required. Localism in Broadcasting? Where is it? It's gone for the most part. It moved to the nearest larger metro area via the Tuck rule.

LPFM should evolve into a service that fills the void left by mega-groups who now own up to eight stations under one roof, all powered by some type of voice-tracked robo-jock computer.

Even secondary markets have clustered every available signal licensed within earshot under the Tuck rule. The cluster uses Tuck to move stations from a community, often leaving behind a Class IV AM or a 250-watt AM.

Broadcasters with passion for community broadcasting unable to ride the aquisition wave after The Telecom Act. of 1996 find it difficult to enter the arena again.

Lip service is paid to localism, although former FCC Chairman Michael Powell's comments were uplifting and inspiring but were : "...full of sound and fury signifying nothing."

IF--repeting for emphasis--IF, the Federal Communications Commission truly cares about local broadcasting, may I suggest the following:

1) continue the push for LPFM; the permanent removal of third-adjacent separation and ultimately the lifting of non-commercial restrictions.

2) it would be a travesty to learn that LPFM is merely a "pawn"--a bone thrown to the large group owners while they continue their feeding frenzy of aquisitions through auctions. Auctions which place an unfair advantage to the local broadcaster, yet reward the well-heeled group owner who wants to further leverage his/her cluster. The comparative hearing process should be re-visited for all new frequency allocations. A LOCAL broadcaster should always prevail with respect to community broadcasting.
3) Prohibit any comment or petition from any individual, group or entity from becoming a part of the record for any LPFM CP unless that group or individual also resides within a 10-mile area.

In summation, LPFM will, in fact, further fragment radio listening. It could cost group owners millions in lost revenues due to reduced Arbitron shares.

It is hoped that LPFM is merely the first phase--a test if you will--for the potential allocation of more frequencies. Or possibly the ability of LPFM licnesee entities to conduct terrain studies to enhance their coverage.

Possibly this is the first step in an incremental process that will return LOCAL news, LOCAL information, LOCAL issues to radio. Where the phrase: "to serve the public interest as a public trustee until Jan. 1, 200?" will actually mean something.